

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF TEXAS**

**REGINA JACKSON AND RUDOLF
WILLIAMSON, INDIVIDUALLY,
AND ON BEHALF OF THE ESTATE
OF RACHEL JACKSON,
DECEASED**

VS.

**JOHN S. FORD, M.D., and TRAVIS
COUNTY, TEXAS**

CIVIL ACTION NO. A10CA522 SS

PLAINTIFFS' ONE PARAGRAPH STATEMENT OF CONTENTIONS

Plaintiffs, by and through the undersigned counsel, respectfully provide the Court, as ordered, with their One Paragraph Statement of Contentions:

Plaintiffs contend that Rachel Jackson's personal injury and death were proximately caused by the negligence of John Ford, MD and Travis County. Specifically, Rachel Jackson's injury and death was caused by Dr. Ford's negligent and unsafe psychiatric care of Rachel Jackson, and by Travis County's negligent and unsafe prescription, dispensation and administration of antipsychotic medication to Rachel Jackson. As result of Rachel Jackson's injury and death, Rachel Jackson suffered pain and mental anguish, and Rudolf Williamson and Regina Jackson, biological parents of Rachel Jackson, suffered mental anguish and loss of consortium.¹

¹ This statement of contentions does not include those contentions made in Plaintiffs' Original Complaint which were dispensed by summary judgment in the Court in its Order dated December 6, 2011 (Dkt. 80). By not including those contentions here Plaintiffs do waive and do not intend to waive their right to appeal that order and make contentions consistent with Plaintiffs' civil rights claims under 42 U.S.C. § 1983 on remand.

Respectfully submitted,

HENDLERLAW, P.C.



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ATTORNEYS FOR PLAINTIFF

CERTIFICATE OF SERVICE

I certify that a copy of PLAINTIFFS' ONE PARAGRAPH STATEMENT OF CONTENTIONS was filed and served on January 6, 2012 on the Court's CM/ECF system, which will automatically serve a Notice of Electronic Filing on the following attorneys for Defendants:

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